

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HARRIS CORPORATION,	)	
	)	
Plaintiff,	)	
	)	No. 2:18-cv-00439-JRG (LEAD CASE)
v.	)	
	)	
HUAWEI DEVICE USA, INC.	)	
HUAWEI DEVICE CO., LTD.,	)	
HUAWEI TECHNOLOGIES USA INC.,	)	<b>Jury Trial Demanded</b>
HUAWEI TECHNOLOGIES CO. LTD., AND	)	
HUAWEI DEVICE (SHENZHEN) CO., LTD.,	)	
	)	
Defendants.	)	

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HUAWEI DEVICE USA, INC.	)	
HUAWEI DEVICE CO., LTD.,	)	
HUAWEI TECHNOLOGIES USA INC.,	)	
HUAWEI TECHNOLOGIES CO. LTD., AND	)	No. 2:19-cv-00222-JRG
HUAWEI DEVICE (SHENZHEN) CO., LTD.,	)	
	)	
Plaintiffs,	)	
	)	<b>Jury Trial Demanded</b>
v.	)	
	)	
HARRIS CORPORATION	)	
	)	
Defendant.	)	

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**HUAWEI’S PROPOSED LIST OF TERMS AND  
CLAIM ELEMENTS REQUIRING CONSTRUCTION**

In accordance with the Court’s Docket Control Order (No. 2:18-cv-439-JRG, D.I. 55; No. 2:19-cv-222-JRG, D.I. 3) and Local Patent Rule 4-1, Huawei Device USA, Inc., Huawei Device Co. Ltd., Huawei Technologies USA, Inc., Huawei Technologies Co. Ltd., and Huawei Device (Shenzhen) Co., Ltd., (Defendants in 2:18-cv-439-JRG; Plaintiffs in 2:19-cv-222) (collectively, “Huawei”) hereby serve their Proposed List of Terms and Claim Elements Requiring

Construction on Harris Corporation (Plaintiff in 2:18-cv-439-JRG; Defendant in 2:19-cv-222)

(“Harris”). Huawei reserves the right to modify, supplement, or otherwise amend this list, including as it continues its review of Harris’s Infringement Contentions in 2:18-cv-439-JRG (which remain deficient for the reasons set forth most recently in the June 19, 2019 letter from Christopher Bonny to Corey Johanningmeier) and Harris’s Invalidity Contentions in 2:19-cv-222-JRG, and in response to terms or claim elements identified by Harris for construction.

Huawei further reserves the right to offer constructions for any additional terms that are proposed for construction by Harris or any party in any co-pending litigation of any asserted patent(s) or related patent(s). Terms marked with a \* may be governed by 35 U.S.C. § 112(f).

**I. U.S. PATENT NO. 6,535,227 (CASE NO. 2:18-CV-00439-JRG)**

<b>No.</b>	<b>Proposed Claim Term</b>	<b>Claims</b>
1	Preamble	1, 5, 9, 17, 24
2	“a system design window for displaying [network icons/icons] of a network map...wherein respective [network icons/icons] are linked together”	1, 5, 9, 17, 24
3	“security posture”	1, 5, 9, 17, 24
4	“vulnerability posture”	5, 9, 17
5	“vulnerability”	1, 5, 8, 9, 15, 17, 22, 24
6	“a system design window”	1, 5, 9, 17, 24
7	“after a [security/vulnerability] posture of the network has been established”	1, 5, 9, 17, 24
8	“correlating a system object model database that supports information data requirements of disparate network vulnerability analysis programs with any data results obtained from the programs”	1, 5, 9, 17
9	“a system object model database”	1, 5, 9, 17
10	“disparate network vulnerability analysis programs”	1, 5, 9, 17
11	“higher risk node” / “less severe risk node”	5, 17
12	“a select node configuration edit box having a user selectable vulnerability profile [for selecting a vulnerability of a respective	8, 15, 22, 24

	node/for a network node/for a respective node/of a network node]”	
13	“a manager window for displaying properties of network elements”	3, 13
14	“a manager window on which respective properties of network nodes are displayed and edited”	5, 17
15	“a node properties display box for editing the properties of network nodes for network design alternatives”	6, 20
16	“a vulnerability posture window for displaying user readable items indicative of vulnerable network [elements/icons]”	9, 17
17	“a chart indicative of vulnerable network [elements/nodes]”	10, 18
18	“a spreadsheet indicating the vulnerable network [elements/nodes]”	11, 19

## II. U.S. PATENT NO. 6,958,986 (CASE NO. 2:18-CV-00439-JRG)

No.	Proposed Claim Term	Claims
1	“a plurality of mobile nodes each comprising a wireless transceiver and a controller for controlling said wireless transceiver”	1, 9
2	“scheduling [a] respective semi-permanent time slot[s] to establish [a] communication link[s] [with/between respective pairs of] neighboring mobile nodes for transmitting data [...] therebetween”	1, 9, 17, 25
3	“scheduling demand assigned time slots for establishing additional communication links [with [said]/[the]]/[between the pairs of] neighboring mobile nodes”	1, 9, 17, 25
4	“scheduling demand assigned time slots for establishing additional communication links with the neighboring mobile nodes for transmitting data therebetween based upon the link utilization metrics and data priority levels”	1, 17
5	“determining respective link utilization metrics for each data priority level for each communication link”	1, 17
6	“mobile node”	1, 9, 17, 22, 25
7	“each link utilization metric is [determined] based upon a quantity of data sent during at least one prior semi-permanent time slot corresponding to the respective priority level”	5, 21
8	“determining link utilization metrics for each communication link based upon a quantity of data previously sent over the	9, 25

	communication link during the semi-permanent time slots and the data queue”	
9	“wherein said controller further comprises a queue for storing data prior to transmitting, and wherein each link utilization metric is determined based upon a quantity of data corresponding to the respective priority level in said queue.”/“wherein each mobile node comprises a queue for storing data prior to transmitting, and wherein the link utilization metrics are determined based upon quantities of data in the queues corresponding to respective priority levels”	6, 22

### III. U.S. PATENT NO. 6,980,537 (CASE NO. 2:18-CV-00439-JRG)

No.	Proposed Claim Term	Claims
1	Preamble	1, 16, 30, 33, 36, 45, 54, 59, 64
2	“routing unit”/“relay unit”	1, 10, 11, 16, 24, 25, 30, 33, 36, 38, 39, 40, 45, 47, 48, 49, 54, 58, 59, 63, 64, 68
3	“member unit”	1, 16, 30, 33, 36, 45, 54, 58, 59, 63
4	“designate a status of said communication unit as one of said [routing unit/relay unit] and said member unit to configure said communications network”	1, 54
5	“designating as said routing unit each communication unit communicating with at least one neighboring unit isolated from communications with remaining neighboring units of that communication unit”	47
6	“designating said communication unit as said routing unit in response to determining that said communication unit communicates with at least one neighboring unit that is isolated from communications with remaining neighboring units of said communication unit”	16
7	“designating said communication unit as said relay unit based on said examination and in response to determining that at least one neighboring communication unit is required to utilize said communication unit to communicate with network communication units that are outside the range of and greater than one hop away from said neighboring communication unit”/“ designate at least one communication unit as a relay unit	59, 64

	to transfer network information based on said examination and in response to determining that said at least one communication unit is required to be utilized by at least one neighboring unit to communicate with communication units that are outside the range of and greater than one hop away from said neighboring units”	
8	“determining a status of said each communication unit as a routing unit for routing network traffic or as a member unit of a corresponding routing unit in accordance with information contained within received unit status messages”	33
9	“designating said communication unit as a transmission routing unit in response to determining that said communication unit communicates with at least one neighboring routing unit that is isolated from communications with remaining neighboring routing units of said communication unit”	24
10	“designating as said transmission routing unit each communication unit that communicates with at least one neighboring routing unit isolated from communications with remaining neighboring routing units of that communication unit”	48
11	“determining a status of each communication unit as said routing unit of said second network tier for routing network traffic or as a member unit of said first network tier and associated with a routing unit”	45
12	“re-evaluate/[re-evaluating] said communication unit designation in response to connectivity changes in said network”	16, 59, 64
13	“communication unit status as said routing unit is ... re-evaluated in response to changes...”	30, 33
14	“transmitting a unit status message at a periodic time interval”	18, 61
15	“periodically transmitting a unit status message from each communication unit”	33
16	“a [wireless] communications network”	1, 16, 30, 33, 36, 45, 54, 59, 64
17	“neighboring unit”	1, 4, 16, 18, 30, 33, 38, 47, 54, 59, 64
18	“connectivity information”	1, 4-5, 10-11, 16, 18-19, 24-25, 38-40, 47-49, 54, 56, 58-59, 61, 63-64, 66, 68
19	“forming a first network tier ...” “form a second network tier ...”	36, 45

	“form a third network tier...”	
20	“a configuration module to designate a status of said communication unit as one of said [routing unit/relay unit] and said member unit to configure said communications network”*	1, 54
21	“a configuration module to determine a status of that communication unit as a routing unit for routing network traffic or as a member unit of a corresponding routing unit in accordance with information contained within received unit status messages”*	30
22	“neighbor module to examine said network connectivity information and identify neighboring units of said communication unit that are isolated from communications with remaining neighboring units of said communication unit”*	1
23	“designation module to designate said communication unit as said routing unit in response to determining that said communication unit communicates with at least one neighboring unit that is isolated from communications with remaining neighboring units of said communication unit, wherein said communication unit designation as said routing unit is fixed for routing subsequent network messages”*	1
24	“a unit designation module to examine network connectivity information relating to that communication unit and to designate that communication unit as said routing unit in response to that communication unit communicating with at least one neighboring unit that is isolated from communications with remaining neighboring units of that communication unit”*	38
25	“monitor module to re-evaluate said communication unit designation in response to connectivity changes in said network”*	1
26	“evaluation module to re-evaluate said communication unit status in response to connectivity changes in said network”*	36
27	“a configuration module to designate a status of said communication unit as one of said relay unit and said member unit to configure said communications network, wherein said configuration module includes”*	54
28	“a neighbor module to examine network connectivity information and identify at least one neighboring unit of said communication unit that is required to utilize said communication unit to communicate with network communication units that are outside the range of and greater than one hop away from that neighboring unit”*	54

29	“a designation module to designate said communication unit as said relay unit based on said examination and in response to determining that at least one neighboring communication unit is required to utilize said communication unit to communicate with network communication units that are outside the range of and greater than one hop away from said neighboring communication unit”*	54
30	“evaluation module to re-evaluate said communication unit designation in response to connectivity changes in said network”*	54
31	“status transmission module to facilitate transmission of a unit status message at a periodic time interval, wherein said unit status message includes unit connectivity information relating to network connectivity of said communication unit”*	4
32	“a status transmission module to facilitate periodic transmission of a unit status message”*	30
33	“a status transmission module to facilitate transmission of a unit status message at a periodic time interval, wherein said unit status message includes network connectivity information”*	56, 66
34	“status reception module to facilitate reception of said unit status message from said each neighboring unit and to update said connectivity information within said storage unit in accordance with unit connectivity information contained within each received unit status message”*	4
35	“interval module to adjust said periodic time interval in response to detecting modifications in network connectivity indicated by said updated connectivity information within said storage unit”*	5
36	“interval module to adjust the time between each said periodic transmission in response to detecting modifications in connectivity with neighboring units”*	30
37	“interval module to adjust said periodic time interval to accommodate network conditions”*	57, 67
38	“a routing unit configuration module to examine said network connectivity information within said link storage unit in response to said communication unit being designated as said routing unit and to designate said communication unit as a transmission routing unit in response to determining that said communication unit communicates with at least one neighboring routing unit that is isolated from communications with remaining neighboring routing units of said communication unit”*	10



39	“a routing unit configuration module to determine a status of that communication unit as a transmission routing unit in response to that communication unit being designated as said routing unit, wherein said communication unit status as a transmission routing unit is fixed for flooding subsequent network connectivity messages”*	36
40	“a routing unit designation module to examine network connectivity information relating to designated routing units stored within a link storage unit of that communication unit and to designate that communication unit as a transmission routing unit in response to that communication unit communicating with at least one neighboring routing unit that is isolated from communications with remaining neighboring routing units of that communication unit”*	39
41	“a configuration module to determine a status of that communication unit as said routing unit of said second network tier for routing network traffic or as a member unit of said first network tier and associated with a routing unit”*	36
42	“message forwarding module to receive an update message from a neighboring transmission routing unit in response to said communication unit being designated as said transmission routing unit and to transmit said received message to neighboring routing units to facilitate synchronization of said link storage unit of each said routing unit”*	11
43	“a message forwarding module to receive an update message from a neighboring transmission routing unit in response to that communication unit being designated as said transmission routing unit and to transmit said received message to neighboring routing units of that communication unit to facilitate synchronization of said link storage unit of each said routing unit”*	40

#### IV. U.S. PATENT NO. 7,027,426 (CASE NO. 2:18-CV-00439-JRG)

No.	Proposed Claim Term	Claims
1	Preamble	1, 8
2	“route request”	1-3, 8-10, 13-14, 18-19, 23-24
3	“electrically separate channels”	1, 8, 18
4	“at a source node, sending a route request over each of the plurality of electrically separate channels to discover routing to a destination node”	1, 8

5	“at each intermediate node, determining whether the intermediate node can support the route requested and, if so, forwarding the route request to other intermediate nodes and the destination node over each of the plurality of electrically separate channels”	1
6	“at each intermediate node, determining whether the intermediate node can support the route requested and, if so, forwarding the route request to one of other intermediate nodes and the destination node”	9
7	“at the destination node, upon receiving the route request, generating a reply to the source node for each discovered route”	1, 10
8	“at the source node, selecting a route to the destination node on at least one of the plurality of electrically separate channels”	1, 8
9	“select a route to the destination node on at least one of the plurality of electrically separate channels”	18
10	“the source node sends the route request over each of the plurality of channels sequentially”	2, 13
11	“prioritizing discovered routes”	5, 15
12	“wherein prioritizing comprises calculating a metric for each discovered route to the destination node, the metric being based upon at least one of available bandwidth, error rate, end-to-end delay, end-to-end delay variation, hop count, expected path durability, and priority”	6, 16
13	“mobile node”	1, 8, 18
14	“a source node channel identifier”	3, 14, 24
15	“a controller to route communications via the communications device”*	18
16	“a route discovery unit to transmit route requests over each of the plurality of electrically separate channels to discover routing to a destination node”*	18
17	“a communications device to wirelessly communicate with other nodes of the plurality of nodes via the wireless communication links”*	18
18	“route selection unit to select a route to the destination node on at least one of the plurality of electrically separate channels”*	18
19	“route request processing unit to determine whether the node can support the route requested and, if so, to forward the route request to one of other intermediate nodes and the destination node”*	19

20	“reply generator to generate a route reply to a source node for each discovered route”*	20
21	“data transmission unit to send a transmission to the destination node along the selected route”*	22
22	“discovery unit sends the route request over each of the plurality of channels sequentially”*	23
23	“route prioritizing unit to prioritize discovered routes”*	25
24	“prioritizing unit calculates a metric for each discovered route to the destination node, the metric being based upon at least one of available bandwidth, error rate, end-to-end delay, end-to-end delay variation, hop count, expected path durability, and priority”*	26

**V. U.S. PATENT NO. 7,224,678 (CASE NO. 2:18-CV-00439-JRG)**

<b>No.</b>	<b>Proposed Claim Term</b>	<b>Claims</b>
1	Preamble	12, 51
2	“wireless local or metropolitan area network”	12, 51
3	“wireless network”	12, 13, 17, 18, 19, 20, 56
4	“a policing station”	12
5	“monitoring transmissions among said/[the] plurality of stations”	12, 17, 51, 56
6	“failed attempts to authenticate MAC addresses” / “a number of failed attempts to authenticate a MAC address”	12, 51, 52
7	“intrusion alert”	12, 13, 17, 18, 19, 51, 52, 56, 57, 58
8	“within a predetermined period”	13, 52
9	“one of the detected service set IDs being different than the at least one service set ID of the wireless network”	17, 56
10	“detects/[detecting] transmissions over the at least one channel not originating from one of the plurality of stations”	18, 57
11	“base station”	20

**VI. U.S. PATENT NO. 7,327,690 (CASE NO. 2:18-CV-00439-JRG)**

<b>No.</b>	<b>Proposed Claim Term</b>	<b>Claims</b>
1	Preamble	32, 40, 71, 78
2	“wireless local or metropolitan area network”	32, 40, 71, 78
3	“wireless network”	32, 33, 34, 36, 38, 39, 40, 41, 42, 43
4	“greater than about three”	34, 41, 73, 76, 79
5	“a policing station”	32, 40
6	“monitoring transmissions among said plurality of stations”	32, 40, 71, 78
7	“collisions of packets having a predetermined packet type” / “a threshold number of collisions of packets having the predetermined packet type”	32, 71
8	“intrusion alert”	32, 36, 38, 40, 42, 71, 75, 77, 78, 80
9	“wherein the predetermined packet type comprises at least one of authentication packets, association packets, beacon packets, request to send (RTS) packets, and clear to send (CTS) packets”	33, 72
10	“collisions of a same MAC address” / “threshold number of collisions of a same MAC address”	40, 36, 75, 78, 79
11	“base station”	39, 43

**VII. U.S. PATENT NO. 7,440,572 (CASE NO. 2:18-CV-00439-JRG)**

<b>No.</b>	<b>Proposed Claim Term</b>	<b>Claims</b>
1	“encrypting both address and data information for transmission”	1, 47
2	“decrypting both [the] address and [the] data information upon reception”	1, 47
3	“encrypting bits”	1
4	“by at least adding a plurality of encrypting bits to both the address and the data information”	1
5	“equipping a plurality of LAN devices with respective secure wireless LAN devices”	47
6	“wireless transceiver carried by [said/the] housing”	1, 47
7	“medium access controller (MAC) carried by [said/the]”	1, 47

	housing”	
8	“cryptography circuit carried by [said/the] housing”	1, 47
9	“cryptography circuit ... connected to said MAC and said wireless transceiver”	1
10	“cryptography circuit ... cooperating with the MAC and the wireless transceiver”	47
11	“a cryptography circuit ... for encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the data information, and for decrypting both the address and the data information upon reception”	1

#### VIII. U.S. PATENT NO. RE44,325 (CASE NO. 2:19-CV-00222-JRG)

No.	Proposed Claim Term	Claims
1	“cannot be damaged under any circumstances”	30, 48, 50, 57
2	“capacitive impedance”	42, 48, 51, 59
3	“resistive impedance”	42, 49, 52, 53, 58, 60

#### IX. U.S. PATENT NO. 8,416,892 (CASE NO. 2:19-CV-00222-JRG)

No.	Proposed Claim Term	Claims
1	“wherein the number of preambles generated from a single root sequence is $N_{\text{pre}} = \lfloor N_{\text{NC}} / N_{\text{CS}} \rfloor$ ”	4
2	“ $x_{u,v}(k) = x_{u,v}((k + vN_{\text{CS}}) \bmod N_{\text{ZC}})$ ”	6, 15

#### X. U.S. PATENT NO. 9,838,851 (CASE NO. 2:19-CV-00222-JRG)

No.	Proposed Claim Term	Claims
1	“second MBMS data packets are to be scheduled by the eNB before the eNB schedules a service of the consecutive MBMS data packets” / “second MBMS data packets are to be scheduled before the device schedules a service of the consecutive MBMS data packets”	3, 7
2	“the remaining subframes comprise subframes being after the other subframes in the DSP” / “the remaining subframes	4, 8

	comprise subframes after the other subframes in the DSP”	
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**XI. U.S. PATENT NO. 10,117,226 (CASE NO. 2:19-CV-00222-JRG)**

No.	Proposed Claim Term	Claims
1	“when a multicast control channel is updated” / “when the multicast control channel is updated”	1, 2, 4, 6, 7, 9, 11, 12, 14
2	“for the MCE to determine the base station to send the multimedia broadcast multicast service data” / “for the MCE to determine the base station to resume sending the multimedia broadcast multicast service data” / “to determine the base station to send the multimedia broadcast multicast service data”	5, 10, 15

Dated: July 11, 2019

/s/ Christopher M. Bonny

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of HUAWEI'S PROPOSED LIST OF TERMS AND CLAIM ELEMENTS REQUIRING CONSTRUCTION, has been served, via e-mail, upon the attorneys of record for Harris Corporation on this 11<sup>th</sup> day of July, 2019.

/s/ Drago Gregov